REMARKS/DISCUSSION OF ISSUES

Claims 1, 3-7 and 9-19 are pending in the application. Claims 1, 3-7 and 9-19 are rejected.

Claims 1, 3-7, 9-12 and 16-19 are rejected under 35 USC 102(e) as being anticipated by Chim (U.S. patent 6,275,258).

In response to Applicant's previous arguments, the Examiner has argued that claims 1 and 7 only require that the apparatus contain at least one sequence of camera parametrics.

However, claims 1 and 7 do not require an apparatus containing at least one sequence of camera parametrics. Rather, these claims require 'selecting at least one sequence of camera parametrics from a plurality of sequences of camera parametrics'.

Examples of these sequences for zooming and panning are shown in Applicant's Tables I and II, respectively. Each sequence is more than just zooming or panning. Each sequence is a set of rules for determining the manner of execution of the zoom or pan operation.

Moreover, claims 1 and 7 require the selection of one or more sequences from a plurality of sequences.

In contrast, Chim does not teach or suggest selecting a sequence of camera parametrics from a plurality of such sequences. Chim merely teaches interface means for controlling camera movement (zooming or panning) in response to changes in the relative strength of audio signals from a set of microphones, until the changes in the audio signals are stabilized. See, e.g., col. 4, lines 51-54.

Moreover, Applicant's claims require 'determining criteria for executing said selected sequence of camera parametrics', whereas Chim's criteria for camera movement is not determined,

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but rather has been predetermined, and is always the same,
i.e., the stabilization of the relative strength of audio
signals from a set of microphones.

Thus, Chim does not teach or suggest 'determining criteria
for executing said selected sequence of camera parametrics', as
called for by Applicant's claims.

In response to Applicant's previous argument that Chim is
not able to determine the number of objects in a scene, the
Examiner has stated that Chim discloses that his system can
determine the current speaker from several different speakers,
citing col. 4, lines 63-67. Thus, it is argued that this
inherently includes the ability to determine the number of
objects in a scene.

However, scenes include objects other than speakers, such
as people who never speak and inanimate objects. Chim would not
be able to locate these at all, since his system relies
strictly on audio signals from speakers. Moreover, Chim doesn't
even provide means for keeping track of the number of speakers.
Speakers could come and go from the scene without Chim's system
being aware, since the speakers are not uniquely identified,
but merely tracked based on audio signal levels.

In response to Applicant's previous argument that Chim
does not disclose speech recognition, the Examiner has stated
that audio detection of speech is the same as speech
recognition.

However, Chim only monitors relative signal levels. There
is no teaching or suggestion of any effort to distinguish
speech from any other sound. Moreover, there would be no need
to do so. Consider the case of a speakerphone which is switched
between transmit and receive states by so-called 'voice
activation'. Such a system is activated by sound of any kind,

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not strictly by voice. Thus, a kick of the table or a rustling
of papers can inadvertently switch the device. To provide
actual voice recognition would involve a needless level of
sophistication and expense.

The Examiner further has stated that determining the
positions for objects in a room go hand-in-hand with
determining how many objects are in a room.

However, Chim does not keep track of how many speakers
there are in a room. Chim rather continuously tracks the
changing levels of audio signals in order to find the current
speaker. Chim thus continuously moves from one speaker to the
next, without any attempt to keep track of the number or
location or identity of the speakers.

In response to Applicant's previous argument that Chim
does not disclose determining the object closest to a
predetermined location in the image, the Examiner has stated
that in order to have the speakers captured in the center of
the image, Chim would have to determine the object closest to a
predetermined location or the object closest to the center of
the image.

However, Chim controls camera movement in order to
stabilize the changing audio levels from the microphones. This
control is not the same as determining the object closest to a
predetermined location or the object closest to the center of
the image. Rather, this control finds the object which is
emitting sound by triangulation of the audio signals from
multiple strategically placed microphones. The sound-emitting
object, i.e., speaker, need not be in a fixed location, but in
fact may be moving about the room. See, e.g., col. 3, line 50.

For all of the above reasons, as well as the reasons
advanced in Applicant's prior response, claims 1, 3-7, 9-12 and

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16-19 are not anticipated by Chim, and it is urged that the rejection is in error and should be withdrawn.

Claims 13-15 are rejected under 35 USC 103(a) over Chim, as applied to claim 7 above, and further in view of Steinberg et al. (U.S. patent 6,750,902)(herein 'Steinberg').
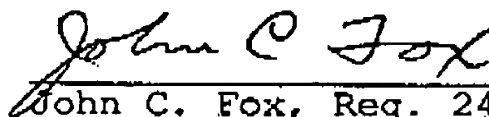
Although Chim does not disclose outputting the criteria for camera movement through a serial connection, a parallel connection or a network, Steinberg is cited to show such a teaching.

While not conceding the patentability per se of claims 13-15, it is urged that these claims are patentable by virtue of their dependency on claim 7.

Accordingly, it is urged that the rejection of claims 13-15 under 35 USC 103(a) is in error and should be withdrawn.

In view of the above arguments and amendments, Applicant urges that all of the pending claims are allowable, and respectfully requests that the Examiner withdraw the rejections of record, allow all the pending claims, and find the application to be in condition for allowance.

Respectfully submitted,

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